

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

IN RE VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

This document relates to:
All Actions

No. 19-md-2875

Honorable Renée Marie Bumb
Special Master Thomas Vanaskie

**CERTIFICATION OF ADAM M.
SLATER IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
ZHP'S OBJECTIONS TO AND
MOTION TO REVERSE SPECIAL
MASTER ORDER 98**

I, ADAM M. SLATER, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey, and a partner at the law firm of Mazie Slater Katz & Freeman, LLC, attorneys for Plaintiffs. I make this Certification in support of Plaintiffs' motion for Rule 37 sanctions against ZHP.
2. The facts set forth in this certification are based upon my personal knowledge, information, and belief, unless otherwise stated.
3. Attached hereto as **Exhibit 1** is a true and accurate copy of ZHP00076700.
4. Attached hereto as **Exhibit 2** is a true and accurate copy of ZHP00076708.

5. Attached hereto as **Exhibit 3** is a true and accurate copy of an excerpt from ZHP01662332.

6. Attached hereto as **Exhibit 4** is a true and accurate copy of an excerpt from ZHP01633850.

7. Attached hereto as **Exhibit 5** is a true and accurate copy of an excerpt from ZHP01458548.

8. Attached hereto as **Exhibit 6** is a true and accurate copy of ZHP00004937.

9. Attached hereto as **Exhibit 7** is a true and accurate copy of an excerpt from PRINSTON00083641.

10. Attached hereto as **Exhibit 8** is a true and accurate copy of an excerpt from PRINSTON00082995.

11. Attached hereto as **Exhibit 9** is a true and accurate copy of an excerpt from PRINSTON00083027.

12. Attached hereto as **Exhibit 10** is a true and accurate copy of an excerpt from PRINSTON00074125.

13. Attached hereto as **Exhibit 11** is a true and accurate copy of an excerpt from PRINSTON00081549.

14. Attached hereto as **Exhibit 12** is a true and accurate copy of an excerpt from PRINSTON00081570.

15. Attached hereto as **Exhibit 13** is a true and accurate copy of an English translation of ZHP00000215.

16. Attached hereto as **Exhibit 14** is a true and accurate copy of ZHP02579748.

17. Attached hereto as **Exhibit 15** is a true and accurate copy of SOLCO00012088.

18. Attached hereto as **Exhibit 16** is a true and accurate copy of SOLCO00189499.

19. Attached hereto as **Exhibit 17** is a true and accurate copy of SOLCO00025179.

20. Attached hereto as **Exhibit 18** is a true and accurate copy of SOLCO00033300.

21. Attached hereto as **Exhibit 19** is a true and accurate copy of SOLCO00181380.

22. Attached hereto as **Exhibit 20** is a true and accurate copy of SOLCO00180393.

23. Attached hereto as **Exhibit 21** is a true and accurate copy of an excerpt from PRINSTON00162349.

24. Attached hereto as **Exhibit 22** is a true and accurate copy of ZHP00494048.

25. Attached hereto as **Exhibit 23** is a true and accurate copy of ZHP01423197.

26. Attached hereto as **Exhibit 24** is a true and accurate copy of ZHP00292149.

27. Attached hereto as **Exhibit 25** is a true and accurate copy of ZHP02666849.

28. Attached hereto as **Exhibit 26** is a true and accurate copy of TEVA-MDL2875-00611842.

29. Attached hereto as **Exhibit 27** is a true and accurate copy of ZHP01224764.

30. Attached hereto as **Exhibit 28** is a true and accurate copy of TEVA-MDL2875-00662718.

31. Attached hereto as **Exhibit 29** is a true and accurate copy of TEVA-MDL2875-00370075.

32. Attached hereto as **Exhibit 30** is a true and accurate copy of ZHP01761094.

33. Attached hereto as **Exhibit 31** is a true and accurate copy of an excerpt from ZHP00667833.

34. Attached hereto as **Exhibit 32** is a true and accurate copy of PRINSTON00468994.

35. Attached hereto as **Exhibit 33** is a true and accurate copy of ZHP02471924.

36. Attached hereto as **Exhibit 34** is a true and accurate copy of ZHP02490581.

37. Attached hereto as **Exhibit 35** is a true and accurate copy of ZHP02385482.

38. Attached hereto as **Exhibit 36** is a true and accurate copy of Plaintiffs' July 19, 2021 letter to ZHP regarding Baohua Chen's custodial file.

39. Attached hereto as **Exhibit 37** is a true and accurate copy of the July 27, 2017 email in English (ZHP 296).

40. Attached hereto as **Exhibit 38** is a true and accurate copy of ZHP 432.

41. Attached hereto as **Exhibit 39** is a true and accurate copy of an excerpt from the transcript of Jun Du's May 27, 2021 deposition.

42. Attached hereto as **Exhibit 40** is a true and accurate copy of an excerpt from the transcript of Min Li's April 22, 2021 deposition.

43. Attached hereto as **Exhibit 41** is a true and accurate copy of an excerpt from the transcript of Jucai Ge's April 30, 2021 deposition.

44. Attached hereto as **Exhibit 42** is a true and accurate copy of two photos from PrinJohnson's Facebook page, <https://www.facebook.com/PrinJohnson-BioPharm-174197192641382/photos/188858567841911>.

45. Attached hereto as **Exhibit 43** is a true and accurate copy of an excerpt from the transcript of Hai Wang's March 11, 2021 deposition.

46. Attached hereto as **Exhibit 44** is a true and accurate copy of Forbes, #2035 Chen Baohua, <https://tinyurl.com/2p88subx>.

47. Attached hereto as **Exhibit 45** is a true and accurate copy of *Munoz v. China Expert Tech., Inc.*, No. No. 07 Civ. 10531, 2011 WL 5346323 (S.D.N.Y. Nov. 7, 2001).

48. Attached hereto as **Exhibit 46** is a true and accurate copy of *Jacobs v. Floorco Enterprises, LLC*, No. 3:17-CV-90-RGJ-CHL, 2020 WL 1290607 (W.D. Ky. Mar. 18, 2020).

49. Attached hereto as **Exhibit 47** is a true and accurate copy of the Declaration of Zhang Pei, dated December 9, 2021.

50. Attached hereto as **Exhibit 48** is a true and accurate copy of an excerpt from the transcript of Min Li's April 20, 2021 deposition.

51. Attached hereto as **Exhibit 49** is a true and accurate copy of an English translation of ZHP02710347, followed by the original Chinese version of the same document.

52. Attached hereto as **Exhibit 50** is a true and accurate copy of the metadata for ZHP00190573, the July 27, 2017 email.

53. Attached hereto as **Exhibit 51** is a true and accurate copy of Pottegård, Kristensen, Ernst, Johansen, Quartarolo, & Hallas, *Use of N-nitrosodimethylamine (NDMA) contaminated valsartan products and risk of cancer: Danish nationwide cohort study*, B.M.J. 12, 362 (Sept. 2018).

54. Attached hereto as **Exhibit 52** is a true and accurate copy of Gomm, Röthlein, Schüssel, Brückner, Schröder, Heß, Frötschl, Broich, & Haenisch, *N-Nitrosodimethylamine-Contaminated Valsartan and the Risk of Cancer: A Longitudinal Cohort Study Based on German Health Insurance Data*, Deutsches Aerzteblatt International 118, 357-62 (2021).

55. Attached hereto as **Exhibit 53** is a true and accurate copy of ZHP's sole English translation of the July 27, 2017 email.

56. Attached hereto as **Exhibit 54** is a true and accurate copy of July 27, 2017 email in Chinese, ZHP00190573 (ZHP 295).

57. Attached hereto as **Exhibit 55** is a true and accurate copy of the transcript of Qiangming Li's April 14, 2021 deposition.

58. Attached hereto as **Exhibit 56** is a true and accurate copy of the transcript of Qiangming Li's April 15, 2021 deposition.

59. Attached hereto as **Exhibit 57** is a true and accurate copy of a May 22, 2018 Email Chain Between Novartis and ZHP, ZHP00405021.

60. Attached hereto as **Exhibit 58** is a true and accurate copy of a June 5, 2018 Email Chain Between Novartis and ZHP, ZHP00359796.

61. Attached hereto as **Exhibit 59** is a true and accurate copy of the relevant excerpt of ZHP's Study Report of Unknown Peak in Residual Solvent of Valsartan, Version 1, ZHP01870977.

62. Attached hereto as **Exhibit 60** is a true and accurate copy of the relevant excerpt of ZHP's Study Report of Unknown Peak in Residual Solvent of Valsartan, Version 2, ZHP00021455.

63. Attached hereto as **Exhibit 61** is a true and accurate copy of a June 7, 2018 Email Chain Between Novartis and ZHP, ZHP01390017.

64. Attached hereto as **Exhibit 62** is a true and accurate copy of a June 13, 2018 Email Chain Between Novartis and ZHP, ZHP00400002.

I hereby certify that the aforementioned statements made by me are true. I am aware that if any of the aforementioned statements made by me are willfully false, I am subject to punishment.

Dated: June 17, 2024

Respectfully Submitted,



Adam M. Slater (NJ Bar 046211993)
MAZIE SLATER KATZ & FREEMAN, LLC
103 Eisenhower Parkway, 2nd Floor
Roseland, New Jersey 07068

Tel.: 973-228-9898

Fax: 973-228-0303

aslater@mazieslater.com

Attorneys for Plaintiffs